

RE: DOREEN D MCLEAN

) Case No. 19 B 23483
)
Debtor) Chapter 13
)
) Judge: JACK B SCHMETTERER

NOTICE OF MOTION

DOREEN D MCLEAN

CUTLER & ASSOC

via Clerk's ECF noticing procedures

1615 FOWLER AVE
EVANSTON, IL 60201

Please take notice that on December 11, 2019 at 11:00 am my designee or I will appear before the Honorable Judge JACK B SCHMETTERER at 219 South Dearborn Courtroom 682, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on November 14, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On August 20, 2019 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend Part 3.1 of the Plan to increase the amount of Select Portfolio Servicing's arrears claim which is causing the plan to be unfeasible.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

/s/ Tom Vaughn

TOM VAUGHN
CHAPTER 13 TRUSTEE
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